

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

Case No. 04-CV74932

CHARLES HADDAD,

Plaintiff, Honorable Anna Diggs Taylor

vs. Magistrate Judge Donald A. Scheer

INDIANA PACERS, an assumed name,  
a/k/a PACERS BASKETBALL CORPORATION,  
an Indiana Corporation, JERMAINE  
O'NEAL, and ANTHONY JOHNSON, Jointly  
and Severally,

Defendants.

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The Deposition of KRIS SIADI, a Witness herein,  
taken pursuant to Notice of Taking Deposition before  
Shari Blythe Holtz, CSR-3910, Registered Professional  
Reporter and Notary Public within and for the County of  
Wayne, State of Michigan, at 5510 Woodward Avenue,  
Detroit, Michigan, on Wednesday, May 24, 2006, commencing  
at about 11:25 a.m.

APPEARANCES:

L.S. CHARFOOS, ESQ., P11799  
Charfoos & Christiansen, P.C.  
5510 Woodward Avenue  
Detroit, Michigan 48202  
(313) 875-8080

For the Plaintiff.

STEVEN M. POTTER, ESQ., P33344  
Potter, Deagostino, Campbell & O'Dea  
2701 Cambridge Court, Suite 223  
Auburn Hills, Michigan 48326  
(248) 377-1700

For Indiana Pacers.

(Appearances continued on page 2.)

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1 Q Was he unconscious?  
2 A I don't think he was unconscious.  
3 Q Was anybody attending to him? Or was he just laying  
4 there in the middle of the room?  
5 A It seemed like he was just laying there in the middle of  
6 the room. There were medical people in there looking at  
7 him, but they weren't like over the top of him.  
8 Q They were not over the top of him?  
9 A Not that I saw, no.  
10 Q How long were you in that place?  
11 A I don't remember. I couldn't even give you an estimate.  
12 I can't remember.  
13 Q So what happened, then, after you got there and saw  
14 Charlie on the floor, then what's the next thing that  
15 happened?  
16 A They took him away to the hospital.  
17 Q Who is "they"?  
18 A Medics.  
19 Q Did you go with him?  
20 A No, not in the ambulance. I drove separate.  
21 Q So from the time you got to Charlie until the time they  
22 took Charlie away, you have no recollection of talking to  
23 Charlie?  
24 A Not that I can remember, no. I don't remember any  
25 conversation.

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1 Q Do you remember Charlie talking, even though you can't  
2 remember what he was saying?  
3 A Not that I can remember, no.  
4 Q Do you remember anything anybody said to you in the place  
5 Charlie was when you got to him?  
6 A No.  
7 Q And is that true from the time you got to Charlie until  
8 the time you left the Palace?  
9 A Anybody talk to me about him? I mean, I talked to people  
10 to get back there and I talked to people in the room, but  
11 I don't remember exactly what was said.  
12 Q That's what I'm asking.  
13 Do you recall anything that was said by anybody  
14 from the time you first got to Charlie until they took  
15 Charlie away in an ambulance?  
16 A No. I do not recall, no.  
17 Q Do you recall anything anybody said from the time you  
18 first got to Charlie until you left the Palace?  
19 A No.  
20 Q At the time you got to Charlie, were you aware that  
21 Charlie had gone onto the floor?  
22 A No.  
23 Q Were you ever aware that Charlie had gone onto the  
24 floor -- did you become aware of that fact at any time  
25 you were aware at the Palace before they took Charlie to

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1 the hospital?  
2 A No.  
3 Q And I think I asked you, you had no contact with Charlie  
4 that night at the Piston game?  
5 A I knew he was there.  
6 Q Did you talk to him?  
7 A On the phone.  
8 Q Did he appear to be intoxicated at any point in time that  
9 night?  
10 A No, not that I know of.  
11 Q Based on what you could hear on the phone?  
12 A No.  
13 Q Did you see him drinking that night?  
14 A No.  
15 Q Do you know what Charlie's drinking habits are?  
16 A No.  
17 Q Do you know him to drink? Have you ever known him to  
18 drink alcohol or beer or wine?  
19 A Yes.  
20 Q Did you have season tickets to the Pistons?  
21 A No.  
22 Q You just happened to be there that night?  
23 A Yes.  
24 Q You knew Charlie had season tickets?  
25 A Yes.

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1 Q Had you ever been to a basketball game with Charlie at  
2 the Palace prior to November of '04?  
3 A Yes.  
4 Q Had you ever observed Charlie's drinking habits at the  
5 basketball games you've been to with him?  
6 A No.  
7 Q Did you ever observe Charlie being a problem at the  
8 basketball game?  
9 A No.  
10 Q Did you ever see him talked to by security at the  
11 basketball games?  
12 A No.  
13 Q Were you aware Charlie was a problem at Piston games?  
14 A No.  
15 Q Have you ever seen any reports indicating -- describing  
16 his behavior?  
17 A No.  
18 Q Do you know that he had been talked to by the head of  
19 security about his behavior?  
20 A No.  
21 Q Did you know if Charlie had ever threatened to throw beer  
22 on NBA players before that night?  
23 A No.  
24 Q Do you find that hard to believe?  
25 A Yes.

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1 Q You've never seen a report where Charlie admitted he  
2 wanted to do that?  
3 MR. CHARFOOS: Wait. You are arguing with him.  
4 BY MR. POTTER:  
5 Q I'm asking you, had you ever seen a report where Charlie  
6 admitted he wanted to do that?  
7 A No.  
8 MR. CHARFOOS: Nor have I.  
9 BY MR. POTTER:  
10 Q Did you and Rose follow -- or go to the hospital where  
11 Charlie was taken?  
12 A Yes.  
13 Q When you got to the hospital, were any other family  
14 members there?  
15 A No. I think I was the first one.  
16 Q You and Rose?  
17 A Rose and I, yes.  
18 Q What happened to Sharbell and Bree?  
19 A They just stopped us off. I think they came in for a  
20 minute and then they left. They had to leave.  
21 Q It was their vehicle?  
22 A Yes. Sharbell drove.  
23 Q So they dropped you off; you and Rose stayed at the  
24 hospital?  
25 A Yeah, I think they came in for a minute and they had to

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1 leave.  
2 Q Then other family members showed up eventually?  
3 A Yes.  
4 Q Who else?  
5 A I don't remember exactly.  
6 Q Well, Mr. and Mrs. Haddad said they were there, together  
7 with Ann and Rudy.  
8 A Yes.  
9 Q Do you recall them being there?  
10 A Yes.  
11 Q Did you stay at the hospital the whole time Charlie was  
12 there? In other words, right up to the point where he  
13 was released?  
14 A I don't remember if he was released or not.  
15 Q Did you ever talk to Charlie in the hospital or at the  
16 hospital, either one?  
17 A Yes.  
18 Q What did you talk to Charlie about?  
19 A I don't remember.  
20 Q Do you recall anything Charlie said?  
21 A No.  
22 Q Did you ask Charlie what happened?  
23 A No.  
24 Q Have you ever asked Charlie, from the date -- from  
25 November 19, '04 to the present date, have you ever asked

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1 him why he went on to the floor?  
2 A No.  
3 Q You are aware he did go on to the floor. Have you seen  
4 videotape of him on the floor?  
5 A I've seen videotapes.  
6 Q Would you agree he was on the basketball court?  
7 A No.  
8 Q No?  
9 MR. CHARFOOS: The videotape will speak for  
10 itself.  
11 BY MR. POTTER:  
12 Q I'm asking what you saw on the videotape.  
13 A I don't know what I saw.  
14 Q You don't know what you saw on the videotape?  
15 A No.  
16 Q Did you ever talk to AJ about what happened that night?  
17 A No.  
18 Q Was AJ at the hospital?  
19 A I don't remember.  
20 Q So as I understand your testimony, you don't recall  
21 anything Charlie said to you about anything at the  
22 hospital?  
23 A No.  
24 Q Is that correct?  
25 A Correct.

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1 Q Who took Charlie home?  
2 A I don't remember.  
3 Q Did he go to Burt or did he go to your house?  
4 A I don't remember.  
5 (Deposition interrupted.)  
6 (Short recess.)  
7 ---  
8 (Mr. Akkashian has now joined the deposition;  
9 Mr. Apkarian has now left the deposition.)  
10 BY MR. POTTER:  
11 Q So you don't know where Charlie went from the hospital?  
12 A No. Exactly, no.  
13 Q Did you go home?  
14 A I went home.  
15 Q When's the next time you saw Charlie after that night?  
16 A I don't remember.  
17 Q Have you ever talked to Charlie about what problems he  
18 alleges he has because of that night?  
19 A Repeat the question.  
20 Q Since the night of the brawl, have you ever talked to  
21 Charlie about what problems, physical problems Charlie  
22 contends he has because of what happened?  
23 A He doesn't like to talk about it too much.  
24 Q So you can't recall anything Charlie has ever told you is  
25 wrong with him because of what happened that night?